AZR AMERICAN ZINC RECYCLING
Delivering a Sustainable Future

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May 14, 2019

Ms. Mary Walker
Acting Regional Administrator Region 4
US Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Dear Ms. Walker

This letter is submitted on behalf of American Zinc Products ("AZP") as an incident report in satisfaction of 40 CFR Sections 262.265(i) and 262.17(a)(6).

On April 28, 2019, an accidental fire damaged a portion of the production operation at AZP's facility located at 484 Hicks Grove Road, Mooresboro, NC 28114 (the "Facility") (telephone number: 828-919-3139). AZP promptly implemented the Facility's emergency response and contingency plans. Through the dedicated and extensive efforts of the well-trained emergency responders from both off-site and on-site resources, the fire was successfully contained after several hours, confining the damage to a portion of the Facility and, most importantly, preventing any injury or loss of life.

No hazardous waste was present in the area of the Facility involved in the fire. The primary hazardous material located in the area was sulfuric acid, which constituted a raw material for the process. To the best of AZP's knowledge, no other hazardous materials were present in any substantial quantity at the relevant location at the time of the fire.

In containing and ultimately extinguishing the fire, the emergency responders only utilized water from the fire water system; no fire suppression foam was employed in the response action. After quenching the fire, the suppression water migrated as follows: water either (a) flowed to the cell house basement containment structure or (b) reached paved surfaces, entered existing drains, and was directed by underground pipe to the stormwater retention basin. The cell house basement is an existing containment structure located beneath the cell house and is designed to ensure the containment of any liquids originating and released from the structure above; the design and operation of the structure provides for any such liquids to be contained and directed back to the process operation. The fire water that accumulated in the cell house basement was pumped to process tanks to enable the water to be used in the production process. Therefore, the portion of the fire water that reached the cell house

basement was both contained and will continue to be utilized in a manner consistent with routine production operations for the use of process water and with the process system design.

Fire water that did not flow to the cell house basement generally reached paved surfaces and was conveyed (consistent with normal stormwater management flow patterns) to surface drains connected to the Facility's stormwater collection system. This system directed the collected fire water to the existing stormwater retention basin. At the initiation of the emergency response actions related to the fire incident, the valve controlling discharge from the stormwater retention basin to the Broad River was closed. Therefore, no water related to the fire suppression efforts could be discharged from the basin during the incident or in the context of the immediate response measures.

For several days following the fire, AZP commissioned actions to clean the paved surfaces in the area surrounding the relevant location where the fire had occurred, to collect and remove any material that had been potentially impacted by constituents related to the fire incident.

Thereafter, AZP undertook to visually review these paved surfaces to confirm that they were both dry and clean; several representatives of EPA and the North Carolina Department of Environmental Quality ("NCDEQ") also reviewed and observed these conditions. Therefore, on or before May 3, 2019, AZP had taken appropriate actions to prevent any additional surface contribution to stormwater of constituents related to the fire incident.

With respect to the fire water that had been collected in the stormwater management system and flowed to the retention basin, AZP both evaluated the volume of water in the basin and collected and analyzed samples of that water. Following the contribution of the fire water, the basin was observed to be approximately one-third full, relative to intended operating capacity. Sampling results revealed reduced pH concentrations of several metals that were elevated when compared to the established baseline for waters in this basin. AZP communicated with NCDEQ regarding AZP's plan to neutralize the pH of the collected water. AZP then implemented appropriate neutralization efforts and restored the pH of the collected water to the neutral range, and contributed to the restoration of metals concentrations that are either close to or consistent with the established baseline for discharge from the retention basin, except for zinc concentrations that remain elevated.

In addition, AZP commissioned a program to pump water from the basin into trucks to allow it to be transferred for use within the process operations at the Facility. As of this date, more than one million gallons of water have been removed from the basin in this manner. The use of this water as process water is ongoing.

Consistent with discussions with NCDEQ, AZP did not discharge water from the pond to the Broad River prior to performing additional analytic work. AZP's additional analytical results confirmed that the quality of the water in the retention basin was not substantially elevated (with the exception of zinc) relative to baseline analytic results for the discharge from the basin prior to the fire.

Heavy rainfall during the weekend of May 11 and 12 resulted in a substantial volume of stormwater flow to the basin. In order to preserve the integrity of the retention basis as a critical stormwater management feature, AZP discharged approximately 20,000 gallons of flow from the basin over a few hours. Additional sampling continues to reveal that the quality of the discharged stormwater has generally returned to levels that are not materially above the concentrations related to the baseline conditions prior to the incident, with the exception of concentrations of zinc. In addition, AZP continues to maintain a minimum free board of three feet in the basin from the lowest elevation along the top of the basin wall closest to the Broad River. Maintenance of this minimum free board effectively prevents erosion and loss of the containment wall parallel to the river.

The materials impacted by the fire generally consisted of general building materials (drywall, fiberglass, etc.), the steel support frame and steel siding, and process equipment. Approximately 1.3 million gallons of process liquids in solution have been removed from the process, placed into process tanks and will be managed through and in accordance with normal plant process operations. Upon conducting demolition of structures requiring demolition as a result of the fire, AZP will collect affected materials for analysis and characterization. Based on those analyses, the material will be managed in accordance with applicable regulatory standards. Quantities of materials to be created through demolition activities have not yet been estimated.

Based upon all available information, AZP is confident that the measures that it has implemented since the fire incident have been effective at both evaluating and mitigating any actual or potential hazards to human health or the environment.

Should you have any questions about the issues addressed in this incident report, please contact me.

Very truly yours,

Aili Spearman